



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912**

**RECEIVED**  
FEB 18 2020  
**DES-WEB**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**FEB 12 2020**

Jay Bizarro, President and CEO  
Nylon Corporation of America  
333 Sundial Avenue  
Manchester, NH 03103

Re: Minor modifications for the NYCOA NPDES Permit No. NH0000116 –  
Extension of compliance schedule milestones and correction of facility address

Dear Mr. Bizarro:

Your facility was issued a National Pollutant Discharge Elimination System permit on August 1, 2019 that was also effective on that date. This permit included a compliance schedule (CS) at Part I.C.2.e. for the design and installation of intake screens at the inlet to the cooling water intake pipes in the Merrimack River. The first milestone of the CS is due within six (6) months of the effective date of the permit and requires the submission of a final design for the intake screens, including the proposed layout and calculation of design through-screen velocity. By an email of January 16, 2020 and on your behalf, Ronald Breton of Goldberg Zoino and Associates (GZA) requested a two-month extension of the first milestone of the CS.

EPA acknowledges that the effort to comply with the first milestone of the CS has included gaining an understanding of the current configuration of the non-contact cooling water system, selecting a contractor with underwater construction experience, and determining the scope of work for the contractor. It was also noted by your consultant that the age of the water intake system, personnel changes at that facility, and other considerations of establishing and maintaining compliance with the additional requirements contained in the new permit have resulted in delays to this process. Owing to these factors and because the work to comply with the first milestone occurred during the winter months, your consultant determined that the facility would not be able to meet the first milestone.

Therefore, this letter institutes a minor modification to the Final NPDES Permit pursuant to federal regulations found at 40 C.F.R. § 122.63 to allow for a two (2) month extension to the first milestone of the CS. Since the elapsed time between the first and second milestones was intended to accommodate EPA and NHDES' review and approval of the final design for the intake screens, the Agencies have also allowed for a two (2) month extension of the second milestone of the CS. Therefore, the first milestone will be due within eight (8) months of the

effective date of the permit, no later than April 1, 2020. Accordingly, the due date of second milestone of the CS has been revised from being due within twelve (12) months of the effective date of the permit to being due within fourteen (14) months of the effective date of the permit, no later than October 1, 2020.

The attached permit page reflects the new compliance deadlines for the first two milestones of the CS. The extension for these milestones will not affect the permittee's ability to achieve compliance by the final milestone of twenty four (24) months after the effective date of the permit, nor does the deadline for any affected interim milestone extend more than 120 days after the date specified in the Final Permit. Such changes could not be made with a minor modification as described at 40 C.F.R. § 122.63.

EPA acknowledges that the facility address on the cover page of the Final Permit was listed incorrectly as 33 Sundial Avenue, instead of 333 Sundial Avenue. Therefore, this letter also institutes a minor modification to the Final Permit to list the correct address and a revised cover page is enclosed.

Should you have any questions concerning these minor permit modification, please contact George Papadopoulos at 617-918-1579.

Sincerely,



Thelma Murphy, Chief  
Water Permits Branch

cc: Stergios Spanos, New Hampshire Department of Environmental Services, Water Division  
Ronald Breton, GZA

**AUTHORIZATION TO DISCHARGE UNDER  
THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Clean Water Act as amended, (33 U.S.C. §§1251 et seq.; the "CWA",

**Nylon Corporation of America**

is authorized to discharge from a facility located at

**Nylon Corporation of America  
333 Sundial Avenue  
~~33 Sundial Avenue~~  
Manchester, NH 03103**

to receiving water named

**Merrimack River  
Merrimack River Watershed**

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective upon the date of signature.

This permit expires at midnight, five years from the last day of the month preceding the effective date.

This permit supersedes the permit issued on September 23, 2008.

This permit consists of **Part I, Attachment A** (Freshwater Chronic Toxicity Test Procedure and Protocol, March 2013), and **Part II** (NPDES Part II Standard Conditions, April 2018).

Signed this 1st day of August, 2019.

Ken Moraff

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Ken Moraff, Director  
Water Division  
Environmental Protection Agency  
Region 1  
Boston, MA

the suction end or interior to the cooling water intake pipes shall be removed during installation of the screens.

- c. The design through-screen velocity at the intake screens at the inlet of the cooling water intake pipes shall not exceed 0.5 fps. The maximum velocity must be achieved under all conditions, including during minimum ambient source water surface elevations (based on BPJ using hydrological data) and during periods of maximum head loss across the screens or other devices during normal operation of the intake structure. The intake structure must be monitored by visual or remote inspection at least weekly to ensure that the effective velocity does not exceed 0.5 fps. Remote inspection may include use of a differential pressure gauge to measure flow and ensure screens do not become clogged. The intake screens must be cleared of debris where remote inspections indicate that the maximum velocity of 0.5 fps may be exceeded.
- d. No change in the location, design, or capacity of the present structure, unless specified by this permit, may be made without prior approval by EPA.

e. Compliance Schedule

The Permittee will need to design and install new equipment to comply with the requirements above. As such, the Permit provides a schedule by which the Permittee shall attain compliance with Part I.C.2.b and I.C.2.c. Specifically, steps for the installation and operation of equipment required to comply with these requirements shall be completed as soon as practicable but no later than the schedule of milestones set forth in the Permit. The Permittee shall notify EPA in writing of compliance or non-compliance with the requirements for each milestone no later than fourteen (14) days following each specified deadline.

- (1) Within eight (8) ~~six (6)~~ months of the effective date of the Permit, the Permittee shall submit a final design for the intake screens, including the proposed layout and calculation of design through-screen velocity.
- (2) Within fourteen (14) ~~twelve (12)~~ months of the effective date of the Permit, the Permittee shall commence the process to obtain all necessary permits and approvals for installation of the intake screens.
- (3) Within twenty-four (24) months of the effective date of the Permit, the Permittee shall complete the installation, test, and startup of the intake screens.

3. Discharges of Chemicals and Additives

The discharge of any chemical or additive, such as biocides or corrosion control inhibitors and including chemical substitution, which was not reported in the application submitted to EPA and the State or provided through a subsequent written notification submitted to EPA and the State is prohibited. Upon the effective date of this permit, chemicals and/or additives which have been disclosed to EPA and the State may be discharged up to the frequency and